

Exhibit F

From: Gerstner, Alyssa
To: "Andrew Stephens"; "Heather Hacker"
Cc: "Born, Jayce"; "Martin, Meghan C."; Lollar, Tirzah; "zzz.External.dashby@omm.com"; "zzz.External.jchapa@omm.com"; "Hudson, Matt"; "Margolis, Craig D."; "Odell, Christopher M."; "Raymond.Winter@oag.texas.gov"; "Amy.Hilton@oag.texas.gov"; "zzz.External.lgodesky@omm.com"; "Takakjian, Katie"
Subject: RE: U.S. ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z
Date: Wednesday, September 7, 2022 6:47:00 PM
Attachments: [image001.png](#)

Andrew,

Following up on the discussion during the meet and confer of Aug 30, please let us know if Affiliates' Aug 29 amended responses to Relator's Third Set of RFPs addressed the issues raised in Relator's Aug 23 motion to compel [Dkt. 150] as it relates to Affiliates' responses to Relator's Third Set of RFPs.

Regards,
Alyssa

From: Gerstner, Alyssa
Sent: Monday, August 29, 2022 9:50 PM
To: 'Andrew Stephens' <andrew@hackerstephens.com>; 'Heather Hacker' <heather@hackerstephens.com>
Cc: 'Born, Jayce' <Jayce.Born@arnoldporter.com>; 'Martin, Meghan C.' <Meghan.Martin@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; 'zzz.External.dashby@omm.com' <dashby@omm.com>; 'zzz.External.jchapa@omm.com' <jchapa@omm.com>; 'Hudson, Matt' <Matt.Hudson@arnoldporter.com>; 'Margolis, Craig D.' <Craig.Margolis@arnoldporter.com>; 'Odell, Christopher M.' <Christopher.Odell@arnoldporter.com>; 'Raymond.Winter@oag.texas.gov' <Raymond.Winter@oag.texas.gov>; 'Amy.Hilton@oag.texas.gov' <Amy.Hilton@oag.texas.gov>; 'zzz.External.lgodesky@omm.com' <lgodesky@omm.com>; 'Takakjian, Katie' <ktakakjian@omm.com>
Subject: RE: U.S. ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Good Evening,

Please find the following attached amended responses to Relator's Third RFPs, as discussed on the August 19, 2022 meet and confer and confirmed in Tirzah's August 22, 2022 email:

1. Defendant Planned Parenthood Gulf Coast's Amended Objections and Responses to Relator's Third Set of Requests for Production
2. Defendant Planned Parenthood of Greater Texas's Amended Objections and Responses to Relator's Third Set of Requests for Production
3. Defendant Planned Parenthood South Texas's Amended Objections and Responses to Relator's Third Set of Requests for Production
4. Defendant Planned Parenthood San Antonio's Amended Objections and Responses to Relator's Third Set of Requests for Production

5. Defendant Planned Parenthood Cameron County's Amended Objections and Responses to Relator's Third Set of Requests for Production

Regards,
Alyssa

Alyssa Gerstner
Associate | [Bio](#)

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Washington, DC 20001-3743
T: +1 202.942.5734
Alyssa.Gerstner@arnoldporter.com
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From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Monday, August 22, 2022 6:41 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Heather Hacker <heather@hackerstephens.com>

Cc: Born, Jayce <Jayce.Born@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; zzz.External.dashby@omm.com <dashby@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; Hudson, Matt <Matt.Hudson@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Raymond.Winter@oag.texas.gov; Amy.Hilton@oag.texas.gov; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; Takakjian, Katie <ktakakjian@omm.com>

Subject: RE: U.S. ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew:

Following up on our meet and confer on Friday regarding Relator's 3rd RFPs, the Affiliate Defendants are reviewing their responses and believe there is some room for movement on at least some of the RFPs. They are working on amended responses, which would restart the 15 day clock once the amended responses are served. Affiliate Defendants are working to provide amended responses by the end of the week. Please let us know if you have any questions.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

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Washington, DC 20001-3743

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Tirzah.Lollar@arnoldporter.com

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From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Friday, August 19, 2022 10:22 AM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hudson, Matt <Matt.Hudson@arnoldporter.com>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Raymond.Winter@oag.texas.gov; Amy.Hilton@oag.texas.gov; zzz.External.lgodesky@omm.com <lgodesky@omm.com>

Cc: Born, Jayce <Jayce.Born@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; zzz.External.dashby@omm.com <dashby@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>

Subject: Re: U.S. ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

No problem, 4cst works

Andrew B. Stephens

Partner

Hacker Stephens LLP

www.hackerstephens.com

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From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Friday, August 19, 2022 8:45 AM

To: Andrew Stephens <andrew@hackerstephens.com>; Hudson, Matt <Matt.Hudson@arnoldporter.com>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Raymond.Winter@oag.texas.gov <Raymond.Winter@oag.texas.gov>; Amy.Hilton@oag.texas.gov <Amy.Hilton@oag.texas.gov>; lgodesky@omm.com <lgodesky@omm.com>

Cc: Born, Jayce <Jayce.Born@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; dashby@omm.com <dashby@omm.com>

jchapa@omm.com <jchapa@omm.com>

Subject: Re: U.S. ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew, can we move this to 4cst pls? We had a conflict pop up. Thanks

Sent from Nine

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, August 18, 2022 1:08 PM

To: Lollar, Tirzah; Hudson, Matt; Heather Hacker; Margolis, Craig D.; Hussain, Murad S.; Odell, Christopher M.; Raymond.Winter@oag.texas.gov; Amy.Hilton@oag.texas.gov; zzz.External.lgodesky@omm.com

Cc: Born, Jayce; Martin, Meghan C.

Subject: RE: U.S. ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Thanks, Tirzah. Let's schedule for 3pm CST tomorrow. Dial-in info below.

Andrew

Andrew Stephens is inviting you to a scheduled personal audio conference.

Topic: Andrew Stephens' Personal Audio Conference

Passcode: 030527

Join via URL: <https://us06web.zoom.us/join/3813009255>

Passcode: 030527

Or One tap mobile (US Toll Free): 8335480282,,3813009255#,,,*030527#

Or join by phone:

833 548 0282 (US Toll Free)

+1 253 215 8782 (US Toll)

+1 301 715 8592 (US Toll)

+1 312 626 6799 (US Toll)

+1 346 248 7799 (US Toll)

+1 646 558 8656 (US Toll)

Conference ID: 381 300 9255

Passcode: 030527

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Thursday, August 18, 2022 11:03 AM

To: Andrew Stephens <andrew@hackerstephens.com>; Hudson, Matt <Matt.Hudson@arnoldporter.com>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Raymond.Winter@oag.texas.gov; Amy.Hilton@oag.texas.gov; lgodesky@omm.com

Cc: Born, Jayce <Jayce.Born@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>

Subject: RE: U.S. ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew, we are free tomorrow between 1-4pm CST. Let us know what would work for you.

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Wednesday, August 17, 2022 8:44 PM

To: Hudson, Matt <Matt.Hudson@arnoldporter.com>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Raymond.Winter@oag.texas.gov; Amy.Hilton@oag.texas.gov; zzz.External.lgodesky@omm.com <lgodesky@omm.com>

Cc: Born, Jayce <Jayce.Born@arnoldporter.com>

Subject: RE: U.S. ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Tirzah,

Are you all available tomorrow or Friday to meet and confer regarding the PP Affiliates' objections and responses?

Thanks,

Andrew

From: Hudson, Matt <Matt.Hudson@arnoldporter.com>

Sent: Monday, August 8, 2022 5:59 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Raymond.Winter@oag.texas.gov; Amy.Hilton@oag.texas.gov; lgodesky@omm.com

Cc: Born, Jayce <Jayce.Born@arnoldporter.com>

Subject: U.S. ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Counsel,

Please find attached the following documents:

1. Defendant Planned Parenthood Gulf Coast's Objections and Responses to Relator's Third Set of Requests for Production
2. Defendant Planned Parenthood of Greater Texas's Objections and Responses to Relator's Third Set of Requests for Production
3. Defendant Planned Parenthood South Texas's Objections and Responses to Relator's Third Set of Requests for Production
4. Defendant Planned Parenthood San Antonio's Objections and Responses to Relator's Third Set of Requests for Production
5. Defendant Planned Parenthood Cameron County's Objections and Responses to Relator's Third Set of Requests for Production

Regards,

Matt Hudson

Matt Hudson

Associate | [Bio](#)

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